

**REMARKS**

Claims 1-12 are all the claims pending in the application. New claims 7-12 are added via this Amendment.

**Priority under 35 U.S.C. § 119:**

The Examiner has not acknowledged Applicant's claim for priority and receipt of the priority document. Applicant requests that acknowledgment be made in the next Patent Office paper.

**35 U.S.C. § 102:**

Claims 1 and 2 are rejected under 35 U.S.C. 102(e) as being anticipated by Belleville et al., US Pub. No. 2002/0094629 A1 (hereinafter "Belleville"). Applicant respectfully traverses this rejection in view of the following remarks.

Belleville does not disclose each feature recited in claim 1. By way of example, claim 1 describes, *inter alia*, a shield layer that is connected electrically to a semiconductor substrate via a diffusion layer. The Examiner contends that Belleville discloses an electrode 110 including a shield layer that is formed on a semiconductor substrate 102. Without conceding to comments made by the Examiner, it is submitted that the applied electrode 110 of Belleville is not disclosed as being electrically connected to the alleged semiconductor substrate 102 via a diffusion layer and therefore does not disclose the unique combination of features recited in claim 1.

Withdrawal of the rejection under 35 U.S.C. § 102(e) is requested. Claim 2 is likewise not

anticipated by Belleville at least due to its dependency on claim 1, in addition to its individual recitations.

**35 USC § 103:**

*Claims 3-5*

Claims 3-5 are rejected under 35 U.S.C. 103(a) as being unpatentable over Belleville in view of Emma et al. (US patent No. 6,285,050 [hereinafter “Emma”]). Applicant respectfully traverses this rejection in view of the following remarks.

Belleville in view of Emma would not have taught nor suggested each feature recited in claims 3. As noted above, Belleville does not disclose a shield layer that is connected electrically to a semiconductor substrate via a diffusion layer. This feature is also not taught nor suggested by Bellville. Emma also fails to supplement the deficient teachings of Belleville in at least regard to the claimed shield layer. Thus, the combination of Belleville and Emma would have failed to teach and suggest each feature recited in claim 3, requiring the rejection thereof under 35 U.S.C. § 103(a) to be withdrawn. Claims 4 and 5 are likewise patentable over Belleville in view of Emma at least due to their respective dependencies on claims 1 and 3, in addition to their individual recitations.

*Claim 6*

Claim 6 is rejected under 35 U.S.C. 103(a) as being unpatentable over Belleville, Emma and in view of Kinseki (JP patent No. 08037281A). Applicant respectfully traverses this rejection in view of the following remarks.

The application of Kinseki fails to make up for the deficient teachings of Emma and Kinseki in regard to claim 1. This is because the combined teachings of the applied references do not teach nor suggest the unique combination of features including the claimed shield layer. Thus, claim 6 is patentable over Belleville, Emma and Kinseki at least due to its dependency on claim 1, in addition to its individual recitations.

**NEW CLAIMS:**

New claims 7-12 are added to provide more varied protection. These claims are deemed allowable at least by virtue of their respective dependences on claims 1 and 3, and their unique features recited therein.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

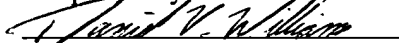
SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Respectfully submitted,



Daniel V. Williams

Registration No. 45,221

Date: November 29, 2004